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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DWIGHT BOUSE,

Case No. 2:24-cv-00687-APG-DJA

Plaintiff,

Stipulation and Order to Extend Discovery Deadlines

THE UNITED STATES OF AMERICA,

(Second Request)

Defendant.

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. The parties have conducted discovery diligently and in good faith. This is the second request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Plaintiff made his initial disclosures on August 27, 2024.
2. Defendant made its initial disclosures on August 30, 2024.
3. Plaintiff served a Request for Production on Defendant on October 15, 2024.
4. Defendant served its first supplemental disclosure of witnesses and documents on October 23, 2024.

- 1 5. Defendant served its First Request for Interrogatories and Requests for
- 2 Production on Plaintiff on November 5, 2024.
- 3 6. Defendant served its second supplemental disclosure of witnesses and
- 4 documents and responses to Plaintiff's Request for Production on November
- 5 14, 2024.
- 6 7. Defendant noticed the depositions of Plaintiff and his wife for February 20,
- 7 2025.
- 8 8. Plaintiff served his first supplemental disclosure of witnesses and documents
- 9 on January 29, 2025
- 10 9. Plaintiff served his second supplemental disclosure of witnesses and
- 11 documents on January 30, 2025.
- 12 10. Defendant has requested additional HIPAA authorizations to be able to fully
- 13 obtain Plaintiff's pertinent medical records.

DISCOVERY REMAINING

The parties need to obtain additional medical records from recently disclosed private providers and the military, take depositions of the parties, designate initial and rebuttal experts, and depose experts and other witnesses.

The parties reserve the right to engage in any other discovery permitted by applicable rules and within the revised discovery deadlines if the court approves this stipulation.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

Since the Order granting the Stipulation to Continue to Discovery (ECF No. 17), the parties have been working diligently to advance discovery.

The extension will allow additional time for the parties to obtain relevant records and provide time for experts to review over 5,000 pages of medical records. Additionally, the extension will allow the parties to coordinate depositions of Plaintiff, witnesses and experts.

The parties' counsel conferred and agreed that a sixty (60) day extension would be

proper. The parties agree that neither party will be prejudiced by the proposed extension, and that they may be prejudiced should the current schedule remain in place. The parties agree the extension is sought in good faith.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

| SCHEDULED EVENT | CURRENT DEADLINE | PROPOSED DEADLINE |
|-------------------------------|-------------------|-----------------------------------|
| Expert Disclosure | February 11, 2025 | April 14, 2025¹ |
| Rebuttal Expert Disclosure | March 14, 2025 | May 14, 2025 |
| Discovery Cutoff | April 14, 2025 | June 13, 2025 |
| Dispositive Motions | May 14, 2025 | July 14, 2025² |
| Proposed Joint Pretrial Order | June 13, 2025 | August 13, 2025 |

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¹ April 12, 2025 is a Saturday.

² July 13, 2025 is a Sunday.

1 This request for an extension of time is not sought for any improper purpose
2 including delay. This is the second request for an extension of discovery deadlines in this
3 matter.

4 Respectfully submitted this 3rd day of February 2025.

5 PAUL PADDA LAW, PLLC

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11 IT IS SO ORDERED:



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13 UNITED STATES MAGISTRATE
14 JUDGE

15 DATED: 2/4/2025

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